

DOW, LOHNES & ALBERTSON, PLLC
ATTORNEYS AT LAW

M. ANNE SWANSON
DIRECT DIAL 202-776-2534
aswanson@dialaw.com

WASHINGTON, D.C.

1200 NEW HAMPSHIRE AVENUE, N.W. • SUITE 800 • WASHINGTON, D.C. 20036-6802
TELEPHONE 202-776-2000 • FACSIMILE 202-776-2222

ONE RAVINIA DRIVE • SUITE 1600
ATLANTA, GEORGIA 30346-2108
TELEPHONE 770-901-8800
FACSIMILE 770-901-8874

May 30, 2002

BY ELECTRONIC FILING

Marlene H. Dortch, Esquire
Secretary
Federal Communications Commission
445 12th Street, NW
Washington, DC 20554

**Re: Notification of *Ex Parte* Communication
MM Docket Nos. 01-235 and 96-197**

Dear Ms. Dortch:

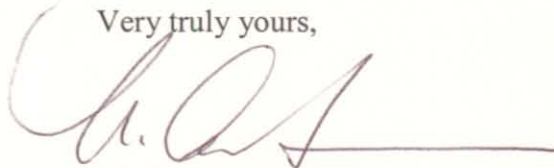
This is to advise you, in accordance with Section 1.1206 of the FCC's rules, that on May 29, 2002, J. Stewart Bryan III, Chief Executive Officer of Media General, Inc. ("Media General"), George L. Mahoney, General Counsel and Secretary of Media General, John R. Feore, Jr. of this office, and I met with Chairman Michael K. Powell and Jonathan Cody regarding the Comments and Reply Comments that Media General submitted on December 3, 2001, and February 15, 2002, respectively, in the above-referenced dockets.

The discussion involved various issues raised in Media General's Comments and Reply Comments, including its experience in operating its co-owned commercial television stations, newspapers, and Internet sites in Tampa, Florida and other markets; Media General's concern over recent cutbacks in local newscasts by the television industry; the company's view that repeal of the newspaper/broadcast cross-ownership rule will enhance the delivery of local news and information; the company's belief that the rule does not advance diversity of viewpoints; the factual information and empirical data in the record related to diversity and competition; and the fact that Section 202(h) of the 1996 Telecommunications Act and recent opinions of the United States Court of Appeals for the District of Columbia Circuit require prompt action in this proceeding. Enclosed with this letter is a copy of the hand-out Media General provided at the meeting.

Marlene H. Dortch, Esq.
May 30, 2002
Page 2

As required by section 1.1206(b), two copies of this letter are being submitted for each of the above-referenced dockets.

Very truly yours,

A handwritten signature in dark ink, appearing to be 'M. Anne Swanson', with a long horizontal line extending to the right.

M. Anne Swanson

Enclosure

cc w/encl. by hand delivery:

The Honorable Michael K. Powell
Jonathan Cody, Esquire

Prompt repeal of the newspaper/broadcast cross-ownership rule is supported by the facts, compelled by the 1996 Telecommunications Act, and would serve the public interest.

* * *

Timing. Twenty-three months ago, you wrote about the need to “engage in a broader debate about the continuing validity of this 25-year old rule” [newspaper/broadcast cross-ownership rule]. In a meeting about 16 months ago, you repeated your interest in having the FCC move promptly to review this Rule. The FCC’s rulemaking has now been pending for 10 months with an extremely complete and substantive record compiled. I urge you to rededicate this FCC to prompt action in this matter

What the Law Requires. I am told by my counsel that the 1996 Telecommunications Act and recent decisions of the Court of Appeals of the District of Columbia Circuit make it clear that the FCC is to initiate and undertake these ownership rule reviews in a deregulatory manner and to repeal and modify any rule that is not necessary in the public interest. The record now before the FCC shows that the newspaper/broadcast cross-ownership rule is not necessary.

Who Has the Burden. A very complete record supporting repeal has been compiled by the FCC. Those who would continue the rule in place have offered conclusions not studies. The FCC simply does not need any additional studies to prove that repeal is warranted, and the 1996 Telecommunications Act states that the burden is on those proposing to retain a rule.

Without the Rule, Local News and Information Will Be Improved. Media General has proven and continues to demonstrate that cross-ownership of broadcast properties and daily newspapers enhances the delivery of news and information and leads to higher levels of non-entertainment programming.

The Rule Does Not Preserve or Enhance Diversity of Viewpoints and Opinion. The experience of Media General and other co-located owners demonstrates that diversity of both viewpoints and opinion is enhanced rather than diminished by co-ownership.

Repeal of the Rule Will Not Harm Competition in Local Advertising Markets. Media General and the NAA have submitted studies demonstrating that co-ownership will not harm local advertising markets.

We need the FCC to act promptly on the record now before it in this proceeding.